

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 17-cv-05806-RJB

DECLARATION OF LANE POLOZOLA
IN SUPPORT OF PLAINTIFF STATE
OF WASHINGTON'S RESPONSE TO
THE GEO GROUP, INC.'S RENEWED
MOTION FOR JUDGMENT AS A
MATTER OF LAW

Pursuant to 28 U.S.C. § 1746(2), I, Lane Polozola, state and declare as follows:

1. I am over eighteen years of age. I have personal knowledge of, and am competent to testify about, the matters contained herein.

2. I am an Assistant Attorney General for the Office of the Attorney General of Washington and one of the attorneys representing the State of Washington in this matter.

3. Attached hereto as Exhibits A-O are true and correct copies of excerpts of the trial transcript as follows:

Exhibit No.	Date	Testimony
Exhibit A	Oct. 18, 2021	Ryan Kimble, GEO Assistant Warden of Finance
Exhibit B	Oct. 14, 2021	Bertha Henderson, GEO Food Service Administrator
Exhibit C	Oct. 20, 2021	Bertha Henderson, GEO Food Service Administrator

Exhibit D	Oct. 13, 2021	William McHatton, former GEO Associate Warden
Exhibit E	Oct. 14, 2021	Michael Heye, GEO Classification Officer
Exhibit F	Oct. 13, 2021	Alisha Singleton, former GEO Classification Officer
Exhibit G	Oct. 15, 2021	David Tracy, GEO Detention Officer
Exhibit H	Oct. 15, 2021	Marc Johnson, GEO Detention Officer
Exhibit I	Oct. 14, 2021	John Patrick Griffin, former GEO Kitchen Supervisor
Exhibit J	Oct. 22, 2021	Amber Martin, GEO Executive Vice President for Contract Administration
Exhibit K	Oct. 13, 2021	The Court
Exhibit L	Oct. 26, 2021	The Court
Exhibit M	Oct. 18, 2021	Bruce Scott, GEO NWIPC Facility Administrator
Exhibit N	Oct. 14, 2021	Jose Medina Lara, former detainee worker at NWIPC
Exhibit O	Oct. 15, 2021	Chris Strawn, Immigration Law Expert

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 29th day of November 2021 in Seattle, Washington.

s/ Lane Polozola
LANE POLOZOLA, WSBA No. 50138

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated this 29th day of November 2021.



CAITILIN HALL
Legal Assistant